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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Rosallee Chiara, Deputy Chief
Satellite Policy Branch
Satellite & Radiocommunication Division
International Bureau
Federal Communications Commission

RE: Docket No. IB 95-91 Further Notice of Proposed Rule
Making on DARS Terrestrial Repeaters

Dear Ms. Chiara:

COMMENTS OF SUSQUEHANNA RADIO CORP.

These comments are filed in response to the supplemental comments of DARS licensees CD Radio Inc. and American Mobile Radio Corporation concerning their proposed use of terrestrial repeaters in Docket IB 95-91.

CD Radio Inc., in its comments, envisions the use of three separate types of on channel repeaters: active, passive, and coaxial cable repeaters for tunnels. If terrestrial repeaters are to be authorized, Susquehanna agrees with the concept of CD Radio, that is, on channel repeaters designed to fill specific gaps in coverage. CD Radio anticipates the use of 600-800 passive repeaters to fill "dead zones" in urbanized areas and Susquehanna agrees that requiring individual licenses for these passive repeaters would be burdensome to both the Commission and the Licensee. Susquehanna recognizes and understands the need for repeaters to provide coverage within long tunnels.

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Active repeaters are another matter. Although Susquehanna recognizes the need for a limited number of active repeaters we believe that their use, or misuse, can be best controlled by individual licenses. CD Radio anticipates 100 to 150 of these active repeaters that will provide service areas within a five to seven mile radius. These are substantial boosters which will require engineering and site acquisition on the part of the licensee. The filing of this information in the form of an application to the Commission should not be considered an unreasonable burden on any licensee. The limited number of anticipated boosters, with an appropriate filing fee, should not cause an undue burden on the commission's resources.

The response of American Mobile Radio Corporation (AMRC) to the Commission's request for information on their proposed use of terrestrial repeaters is far less specific in nature than that supplied by CD Radio, but far greater in scope. The concept of using 1,000 transmitters with an ERP of up to 10 kilowatts of power for a multi-channel broadcast in an exclusive 2.5 mHz allocation appears to be more of a new broadcasting service than a system of gap fillers for a satellite service.

It is this concern of a new terrestrial broadcast service, disguised as a system of terrestrial gap fillers for a satellite service, that was raised by Susquehanna in its previous comments in this proceeding.

Translators Are Not Boosters

In the Amendment to its DARS application filed on May 16, 1997, American Mobile Radio Corporation now proposes to use 2.5 mHz of its allocated spectrum for the exclusive use of what it is calling "terrestrial repeaters." These proposed translators operating on a separate 2.5 mHz frequency band could be developed to provide a relatively good terrestrial broadcast network. Portions of this network could be operated on a nationwide basis and other portions divided geographically as long as they are fed by a satellite source. Susquehanna believes that this is not what the Commission intended when it authorized a satellite DARS service nor is it what the Commission is considering for the addition of terrestrial boosters or gap fillers.

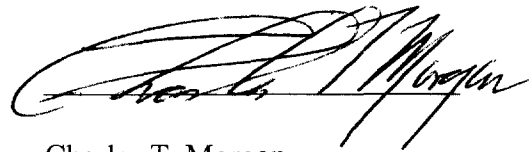
Repeaters on separate frequencies do not have the normal limitation on coverage that is inherent in an on channel booster. The only limitation to these terrestrial transmitters will be the geographic spacing of their sites. It would appear that AMRC is not proposing a system of gap fillers but rather a network of high powered terrestrial transmitters for the major populated areas of the United States. This terrestrial service would be supplemented with direct satellite transmission for rural areas and areas in which it is not economically feasible to install terrestrial transmitters. Susquehanna does not believe that the Commission envisioned a new 2.5 MHz allocation for a multi-channel terrestrial broadcast service when it issued these DARS licenses.

Summary

Susquehanna, again, urges the Commission to use its normal license application process for individual on-channel repeaters to be used by DARS licensees. Susquehanna also believes that it is of utmost importance that the Commission prohibit AMRC or any other DARS licensee from using any portion of their allocated spectrum for a terrestrial only service.

Respectfully submitted,

SUSQUEHANNA RADIO CORP.

A handwritten signature in black ink, appearing to read "Charles T. Morgan". The signature is fluid and cursive, with a large initial "C" and "M".

Charles T. Morgan
Senior Vice President

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